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*Settlement Class Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

DONALD R. CAMERON, et al.,

Plaintiffs,

v.

APPLE INC.

Defendant.

No. 4:19-cv-03074-YGR

**DEVELOPER PLAINTIFFS'  
PROPOSAL FOR FURTHER  
SETTLEMENT FUND  
DISTRIBUTIONS PRIOR TO  
DISTRIBUTION OF UNCLAIMED  
FUNDS TO *CY PRES* RECIPIENT**

Hon. Yvonne Gonzales Rogers

Pursuant to this Court's May 22, 2025 Order Authorizing Further Settlement Distributions Prior to Distribution to *Cy Pres* Recipient (ECF No. 524), Developer Plaintiffs ("Plaintiffs") in the above-referenced action hereby submit this status report and proposal for further distributions from the settlement fund.

As set forth in the accompanying declaration of Steven Platt of Angeion Group, the last round of settlement distributions successfully paid \$1,258,746.98 (93.1% of the remaining settlement fund), to participating Class members. This leaves a residual settlement fund of \$92,881.84. Given the size of this residual fund, Angeion recommends another round of settlement distributions and has concluded that this will be economically feasible. After deducting \$25,000 for further settlement administration costs, the average pro-rata payment from a further distribution would be approximately \$12.

Developer Counsel agree with Angeion's recommendation and support it as a means of maximizing payments to the settlement class. Developer Counsel respectfully request that the Court enter the appended order authorizing another round of distributions.<sup>1</sup>

DATED: September 12, 2025

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman  
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<sup>1</sup> Developer Plaintiffs have conferred with Apple's counsel and have confirmed that Apple takes no position on this application.

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